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IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

MANOMAY, LLC, Bankruptcy No. 19-24450-CMB

Debtor. Chapter 11

THE BLACKWELL LAW FIRM, Document No

Movant,

VS.

MANOMAY, LLC,

Respondent.

MOTION TO WITHDRAW APPEARANCE

AND NOW comes the Blackwell Law Firm, Special Counsel for the Debtor, and file the following **MOTION TO WITHDRAW APPEARANCE**:

- 1. The Movant is the Blackwell Law Firm, Special Counsel for the Debtor.
- 2. This case was commenced on November 14, 2019.
- 3. On December 17, 2019, Debtor filed an Application for Approval of Attorneys regarding Movant's engagement as Special Counsel for the Debtor, which Application was granted by Order of Court on January 27, 2020.
- 4. Due to irreconcilable differences which have arisen between the Movant and the Debtor, there has been a complete breakdown in communications between them, thus preventing the Movant from effectively representing the Debtor.
- 5. The Movant believes that it will be in the best interests of this Estate, as well as all parties-in-interest, if Counsel is allowed to withdraw its appearance in this matter.

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The Movant informed the Debtor that it was going to file the within Motion. While the Debtor has not yet responded, the Movant anticipates that the Debtor will consent to Movant's withdrawal and thus the Movant will supplement the within Motion if and when it hears from the Debtor.

WHEREFORE, the Movants respectfully request that this Honorable Court enter an Order which withdraws the Movants' appearance as Special Counsel for the Debtor and provides the Debtor with sufficient time to obtain new Special Counsel.

Respectfully Submitted,

Date: February 20, 2020 /s/ Robert O Lampl

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CERTIFICATE OF SERVICE

I, Robert O Lampl, hereby certify, that on the <u>20th</u> day of February, 2020, I served a true and correct copy of the foregoing **MOTION TO WITHDRAW APPEARANCE** upon the following (via Electronic Service and/or First-Class U.S. Mail):

Office of the U.S. Trustee 970 Liberty Center 1001 Liberty Avenue Pittsburgh, PA 15222

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Date: February 20, 2020 /s/ Robert O Lampl

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